



Surrogate Parent Handbook



*Guidelines for Tennessee's Early Intervention System
(TEIS)*

Tennessee Department of Education
Division of Special Education
Office of Early Childhood Programs



TENNESSEE DEPARTMENT OF EDUCATION

Division of Special Education

Office of Early Childhood Programs

7th Floor, Andrew Johnson Tower

710 James Robertson Parkway

Nashville, Tennessee 37243-0375

(615) 741-2851

Joseph E. Fisher
Assistant Commissioner

Brenda Bledsoe
Director

Dear Surrogate Parent:

We would like to take this opportunity to thank you for sharing your time, energy, and expertise with us. We are grateful that you have made this commitment to serve as a surrogate parent and to actively participate in the development and implementation of the early intervention system.

You have been appointed by Tennessee's Early Intervention System (TEIS) through the Tennessee Department of Education to act as a parent of a child throughout the early intervention decision-making process. While you may not provide the day-to-day care for the child or assume the financial responsibilities associated with the care of the child, your role is a very important one and is greatly valued.

This training packet has been designed as a resource to help you understand the early intervention system in Tennessee. It serves as a source of information to assist you throughout the early intervention decision-making process. Along with the local TEIS district office, the Office of Early Childhood Programs is available to assist you if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Brenda F. Bledsoe".

Brenda Bledsoe
Director

Surrogate Parent Handbook

Tennessee's Early Intervention System



This manual is designed to assist the TEIS District Offices as they work with surrogate parents and to assist surrogate parents in understanding their roles and responsibilities.

Overview

The Tennessee Department of Education, as Lead Agency for Part C of the Individuals with Disabilities Education Act (IDEA), is responsible for ensuring that a system is in place to locate children in need of surrogate parents and to train and appoint qualified surrogate parents for them. The Department has designated the TEIS District Offices to implement this system.

A surrogate parent needs to be familiar with:

1. The child's eligibility for early intervention services;
2. The responsibilities of the surrogate parent in the early intervention process; and
3. The procedural safeguards provided to the child and family.

As an advocate for the child, a surrogate parent shall seek clarification and assistance whenever he/she believes the needs and rights of the child are not being addressed appropriately. The members of the early intervention team will be a helpful source of information in answering any questions that may arise. If assistance is needed, the surrogate parent may contact the District TEIS Office or call the Office of Early Childhood Programs.

The surrogate parent is involved with the child's early intervention program just as any parent would be. Like the parent of any child with a disability, the surrogate parent is responsible for representing the child in all matters relating to the identification and evaluation of the child's developmental status and the provision of early intervention services for the child and the family.

A surrogate parent must be appointed to represent the child and protect the child's rights in all matters related to:

1. The evaluation and assessment of the child;
2. The development and implementation of the child's Individualized Family Service Plan (IFSP), including annual evaluations and periodic reviews;
3. The ongoing provision of early intervention services to the child; and
4. Any other rights established under Part C.

The surrogate parent is not responsible for the day-to-day care of the child or the financial costs associated with the child's early intervention services. Appointed surrogate parents cannot be held liable for decisions made in good faith regarding a child's early intervention services.

Important Considerations

Natural parents retain their rights with regard to the education of their children unless those rights are expressly abdicated or judicially terminated. Therefore, a surrogate parent should be appointed only in the limited circumstances permitted by the IDEA and its regulations. In some cases natural parents may retain their rights and choose to give written permission for someone else to temporarily act as the parent.

The parent must sign the IFSP. Agency representatives may sign the IFSP to indicate their attendance at a meeting. However, the agency representative may not sign the IFSP as a parent. If a parent cannot be located, the local TEIS Office will appoint a surrogate parent. The surrogate parent, when representing the child's educational interests, shall have the same rights as natural parents of children who are eligible under the IDEA.

In a case where the surrogate parent appointment process is not completed and the health or safety of the child will be endangered by delaying the provision of early intervention services, the services may be provided prior to the completion of the appointment of the surrogate parent. This will occur without prejudice to any rights that the child and parent may have. All procedural safeguards and provisions for early intervention services will continue as stated in the IDEA and state regulations.

Parent Definition

The Individuals with Disabilities Education Act includes two specific provisions to ensure that all children with disabilities have a "parent" to act on their behalf.

1. The extremely broad definition of parent

A "parent" is defined as:

- A natural or adoptive parent of a child;
- A guardian, but not the state if the child is a ward of the State;
- A person acting in the place of a parent (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the child's welfare); or
- A surrogate parent who has been appropriately appointed.

2. The "surrogate parent" mandate

This mandate appoints a surrogate parent to protect the rights of a child if:

- No parent (as defined above) can be identified;
- After reasonable efforts the whereabouts of the parent cannot be discovered; or
- The child is a ward of the State under Tennessee state law.



Foster Parents

The State of Tennessee allows a foster parent to act as a parent if:

1. The natural parents' authority to make educational decisions on the child's behalf has been extinguished;
2. The foster parent has an ongoing, long-term parental relationship with the child;
3. The foster parent is willing to make the educational decisions required of parents; and
4. The foster parent has no interest that would conflict with the interests of the child.

Surrogate parents are not appointed for foster children whose parents retain their rights and are known and available to participate in the early intervention service system. Because a foster parent is selected as the custodian for a child by State or local agencies, and not by the child's parents, they are not considered "parents". However:

1. When a child has been in a foster home for more than one calendar year, it is considered a long-term placement, and the foster parent may "act as the parent" if the natural parents' educational rights have been extinguished. No surrogate parent is needed.
2. When a child has been in a foster home for less than one calendar year, a surrogate parent is needed. The foster parent may volunteer, and after appropriate training, be appointed as the surrogate parent if the natural parents' educational rights have been extinguished.

Surrogate Parent Appointment Process

The local TEIS office will be responsible for:

1. Documenting when a parent is unavailable:
 - A parent is "unavailable if," after reasonable efforts, the TEIS office cannot discover the whereabouts of the parent. Reasonable efforts are determined on a case-by-case basis. The effort should be diligent and thorough. What is "reasonable" may depend upon the child's individual circumstances and the urgency of the child's need for services.
 - A parent is not unavailable simply because the parent is non-responsive or uncooperative or lives a long distance from the child.
2. Submitting a written notice to the Department of Education's Office of Early Childhood Programs in order to document the appointment of a surrogate parent whenever:
 - The parent cannot be identified;
 - The public agency, after reasonable efforts, cannot discover the whereabouts of the parent; or
 - The child is a ward of the State under Tennessee state law.

3. Maintaining sufficient documentation that indicate the efforts made to locate the parent such as:
 - Telephone calls made or attempted and the results of those calls;
 - Correspondence sent to the parents and any responses received;
 - Visits made to the parent's home or place of employment and the results of those visits;
 - Contacts with the agency responsible for care of the child; and
 - Attempts to contact known relatives of the child and other persons interested in the child.
4. Providing training to ensure that the proposed surrogate parent possesses the knowledge and skills needed to adequately represent the designated child.
5. Ensuring that the surrogate parent has no interest that conflicts with the interest of the child such as:
 - The appointee fears he/she may suffer retaliation for vigorously advocating for the rights of the child;
 - The appointee is responsible for other children who may have competing interests with the same public agencies involved with the child; or
 - The appointee's own interests are at odds with those of the child such as a job or other position that might restrict or bias his/her ability to advocate for all the services required.
6. Ensuring that the surrogate parent meets the non-employee requirement that:
 - Specifically prohibits appointing an individual who is an employee of a state or local agency involved in the provision of early intervention or other services to the child and
 - Indicates that a person who otherwise qualifies to be a surrogate parent is not an employee of a public agency solely because he/she is paid by the agency to serve as a surrogate parent.
7. Ensuring that the surrogate parent meets all other qualifications.

Surrogate Parent Responsibilities

The IDEA regulations require that a surrogate parent have knowledge and skills so that they are able to adequately represent the child. To satisfy this requirement, a surrogate parent shall have knowledge about the structure and procedures of early intervention services and the nature of the child's disability. Necessary skills shall include the ability to advocate effectively for a child's appropriate early intervention program in a group decision-making process. The following activities may assist the surrogate parent in assuming his/her responsibilities:

- Becoming acquainted with the child and his/her disability;
- Reviewing the child's records and needs;

- Becoming familiar with the cultural and language background of the child;
- Attending all IFSP and other meetings relating to the identification, evaluation, and provision of early intervention services for the child;
- Ensuring the confidentiality of information and records concerning the child;
- Making sufficient time available to carry out the duties of a surrogate parent; and
- Maintaining a record or file containing the child's records and the surrogate parent's activities (to be given to TEIS upon the termination of his/her appointment).

It is critical that the Surrogate Parent and the designated service coordinator work together throughout the entire process.

Rights of the Surrogate Parent

The surrogate parent has the same rights as the natural parent throughout the decision-making process, including the right to:

- Inspect, review, and obtain copies of all records relating to the child's services and to disagree with content;
- Provide written consent before the initial evaluation or initiation of the provision of early intervention services;
- Receive written notice prior to any evaluation or change in the child's early intervention services;
- Participate in IFSP meetings or other conferences regarding the child's early intervention services;
- Be informed of the early intervention policies, programs, and services of the agency serving the child; and
- Be informed of all procedural safeguards.

Termination of the Surrogate Parent

Once the appointment is made, the child entrusted to the surrogate parent shall be represented by that person in the early intervention services decision-making process until:

- The child is no longer in need of or eligible for early intervention services;
- The natural or adoptive parent of the child assumes responsibility for representing the child in the early intervention decision-making process;
- A new guardian is appointed by a court;
- It is determined that the appointed surrogate no longer adequately represents the child; or
- The surrogate parent resigns his/her appointment.

Surrogate parents may resign their appointment at any time and should give the local TEIS office sufficient notice so that a new surrogate parent may be appointed to represent the child.

The local TEIS office may terminate the appointment of a previously assigned surrogate parent if it is determined that the person:

- Is not able to perform the duties of a surrogate parent;
- Wishes to relinquish his/her responsibilities;
- Has an interest that conflicts with the interest of the child entrusted to the surrogate parent;
- Has violated minimum standards of practice; or
- Has threatened the well-being of the child.

The local TEIS office must be able to justify any termination through documentation of impropriety such as absence at mutually scheduled meetings, failure to learn about the child's needs, etc. Disagreement of the surrogate parent with recommendations or procedures should not be cause for removal. If a surrogate parent is terminated, the surrogate must be permitted to appeal by requesting a due process hearing. The termination should be delayed pending the hearing. It is essential that surrogate parents have recourse when terminated to protect them against retaliation for zealous advocacy.



Training Agenda for Surrogate Parents

Because individuals who are willing to be appointed as surrogate parents often come from a wide variety of backgrounds and experiences, it is advisable to tailor training and support of surrogate parents to their individual needs. The local TEIS office may train several interested persons to make up a “pool” of qualified and trained persons who may be appointed as needed. The local TEIS office may also choose to train on a one-on-one basis when a need for a surrogate parent is identified. It is the responsibility of the local TEIS office to offer the same kind of training to the surrogate parent that is offered to other parents.

Suggested Areas to Cover in Training

1. Legal rights and responsibilities

- Overview of the IDEA – Part C
- Explanation of the rights and responsibilities of parents using the *Rights of Infants and Toddlers with Special Needs* booklet
- Overview of the early intervention system and TEIS
- Dispute resolution

2. Surrogate parent appointment

- Surrogate Parent Handbook
- Explanation of surrogate parent provisions in State and Federal law
- Discussion of resources available to support surrogate parents

3. Early intervention components

- Identification: understanding the child’s disabilities and developmental milestones
- Referral/intake process
- Evaluations and assessments
- IFSP/reviews
- Transition process

4. Key elements of family centered services

- Strategies for good decision-making and effective collaboration with professionals
- Overview of service coordination

5. Receipt of other information such as pertinent articles, etc.

A “Surrogate Parent Training Packet” is provided to each TEIS district office and contains a minimum example of information for each of the areas listed above.

Notations & Additions



Definitions Related to the Surrogate Parent Process

Annual IFSP Meeting – A meeting conducted at least annually to evaluate the Individualized Family Service Plan (IFSP) for a child and the child's family and to revise its provisions as appropriate.

Assessment – The initial and ongoing procedures used by qualified personnel throughout the period of a child's eligibility under Part C to identify:

- The child's unique strengths and needs and the services appropriate to meet those needs;
- The resources, priorities, and concerns of the family related to the development of the child;
- The supports and services necessary to enhance the family's capacity to meet the developmental needs of their infant or toddler with a disability; and
- The current and potential activities, relationships, routines, and culture that constitute the child's natural environments.

Children's Special Services (CSS) – A program through the Tennessee Department of Health which provides comprehensive medical treatment for children birth to 21 who have a disability and/or chronic illness.

Committed to the State – A child for whom a state, local agency, or official has been appointed legal guardian, or who has been committed by a court of competent jurisdiction to the legal custody of a state, local agency, or official with the express authorization that the state, local agency, or official make early intervention decisions for the child.

Custody – Temporary legal status decided by the Court. It results when the Department of Children's Services petitions the court on behalf of a child who is a Child in Need of Assistance (CINA) by virtue of abuse, neglect, or abandonment. It gives the Department of Children's Services the right to physically place the child in a foster home, group home, or institution or to supervise the child in his/her home, with the right to remove the child, if necessary. Unless specifically ordered, it does not terminate or abrogate the parents' rights to participate in the early intervention decision-making process.

DCS – Department of Children's Services

DH – Department of Health

DHS – Department of Human Services

DMR – Division of Mental Retardation

DOE – Department of Education

Due Process – A formal process that allows the family and the agencies involved to present all positions before an impartial administrative law judge when the parent does not agree with the initiation of or change in (1) the evaluation of their child, (2) the placement of their child, or (3) the provision of appropriate early intervention services to their child and family.

Early Intervention Record – Any personally identifiable information about a child or the child's family which is generated by the early intervention system and which pertains to evaluation and assessment, development of an individualized family service plan, and the delivery of early intervention services.

Early Intervention Services – Required services under Part C of the IDEA which are provided to infants and toddlers with disabilities in order to achieve the outcomes identified on the IFSP.

Early Periodic Screening, Diagnosis, and Treatment (EPSDT) – Medical evaluation and ongoing care for children eligible to receive medical assistance provided by local health departments or private medical providers.

Evaluation – The procedures used by appropriate qualified personnel to determine a child's initial and continuing eligibility for early intervention services consistent with Tennessee's Definition of Developmental Delay. This includes determining the status of the child in each of the following developmental areas:

- Cognitive development;
- Physical development, including vision and hearing;
- Communication development;
- Social/emotional development; and
- Adaptive skills.

Family Educational Rights and Privacy Act or FERPA – A federal statute that requires federally supported educational programs to give parents and students access to student records and the ability to correct records they believe are inaccurate. It prohibits the broad release of student records without parents' or students' consent except in limited circumstances.

Guardianship of the Person (or Limited Guardianship) – A long-term, but not permanent, legal status conferred by the Juvenile Court which gives the "Guardianship" specific rights including the right to consent to medical treatment and early intervention planning. It does not terminate the parents' rights, e.g. to visit the child. It is a form of continued Juvenile Court jurisdiction. The public agency may request the appointment of a surrogate parent for children with this status.

Individuals with Disabilities Education Act (IDEA) – Federal legislation that provides funds for special education and related services for children with disabilities from birth through the age of twenty-one years.

Individualized Family Service Plan (IFSP) – A written plan, developed in accordance with Part C of the IDEA, for providing early intervention and other services to an eligible child and the child's family.



Infants and Toddlers with Disabilities – An individual birth to age three who qualifies for early intervention services under IDEA Part C and State Department of Education criteria because he/she:

1. Is experiencing developmental delays, as measured by appropriate diagnostic instruments and procedures in one or more of the following areas: cognitive development; physical development, including vision and hearing; communication development; social or emotional development; and adaptive development; or
2. Has a diagnosed physical or mental condition that has a high probability of resulting in developmental delay; or
3. Exhibits developmental delays for which there are no standardized measures or for which existing standardized procedures are not appropriate for the child's age or a given developmental area.

Interagency Coordinating Council (ICC) – The council that the state must establish to assure coordination and cooperation of all participating agencies in implementing the early intervention program as determined in Part C legislation.

Lead Agency - The agency designated by the Governor to administer the interagency system of early intervention services statewide. Tennessee has designated the Department of Education to be the Lead Agency responsible for the planning, supervision, monitoring, and technical assistance for implementing Part C of the IDEA - Early Intervention Services for Infants and Toddlers with Disabilities and Their Families.

Multidisciplinary –The involvement of two or more disciplines or professions in the provision of integrated and coordinated services including evaluation and assessment activities and the development of the IFSP.

Parent – Under the IDEA means:

1. A natural or adoptive parent of a child;
2. A guardian, but not the State if the child is a ward of the state;
3. A person acting in the place of a parent (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the child's welfare); or
4. A surrogate parent who has been appointed in accordance with Part C of the IDEA;
5. A foster parent may act as a parent if:
 - The natural parent's authority to make educational decisions on the child's behalf has been extinguished under Tennessee law; and
 - The foster parent:
 - Has an ongoing, long-term parental relationship with the child of more than one year in duration;
 - Is willing to make the educational decisions required of parents under the IDEA; and
 - Has no interest that would conflict with the interests of the child.

Part B – Part B of the IDEA provides a free appropriate public education (FAPE) and education-related services to all school-aged children with disabilities (ages 3-21).

Part C – Part C of the IDEA establishes a statewide, comprehensive, coordinated, multidisciplinary, interagency system to provide early intervention services for infants and toddlers (birth through age two) with disabilities and their families.

Periodic Review – A review of the IFSP for a child and the child's family to be conducted every six months, or more frequently if conditions warrant, or if the family requests such a review. The purpose of the periodic review is to determine the degree to which progress towards achieving the outcome is being made and whether modification or revision of the outcomes or services is necessary.

Procedural Safeguards – Processes established by Federal and State regulations to ensure that the mandates of the IDEA are properly carried out by the early intervention system.

Service Coordinator – The individual selected through the IFSP team process (which includes the parents) and designated on the Individualized Family Service Plan to carry out service coordination activities.

Service Coordination – The activities carried out by a service coordinator, in accordance with Part C of the IDEA to assist and enable a child eligible under Part C and the child's family to receive the rights, procedural safeguards, and services that are authorized to be provided under the State's early intervention system.

Tennessee's Early Intervention System (TEIS) – The name for the entity established by the Tennessee Department of Education (lead agency) to be responsible for the planning, implementation, supervision, monitoring, and technical assistance for the state-wide early intervention system for infants and toddlers with disabilities in accordance with Part C of the IDEA.

Transition - The steps to be taken to support the purposeful, organized move from one program to the next or from an early intervention program to a preschool program when the child turns three.

Written Prior Notice – Notice given to the parents of a child eligible under Part C within a reasonable amount of time before a public agency or service provider under Part C proposes, or refuses, to initiate or change the identification, evaluation, or placement of the child, or the provision of appropriate early intervention services to the child and the child's family.



Dear Parent,

The Office of Early Childhood Programs within the Tennessee Department of Education has appointed you to serve as surrogate parent for:

Name of Child

As a surrogate parent you will be expected to:

1. Become acquainted with the eligible child, including his/her disability, his/her early intervention records and needs, and his/her cultural and language background;
2. Represent the child in all IFSP meetings and other meetings relating to the identification, evaluation, and early intervention services for the child;
3. Ensure the confidentiality of information and records concerning the child;
4. Be able to make sufficient time available to carry out the duties of a surrogate parent properly;
5. Have sufficient knowledge and skills to execute these responsibilities and to seek additional consultation and training as needed;
6. Maintain a file containing the child's records and a record of your activity as the surrogate parent. You will forward the file upon termination of your appointment as surrogate parent to the local TEIS office;
7. Notify the local TEIS office whenever you have reason to believe that a conflict of interest exists with respect to your appointment; and
8. Review the Surrogate Parent Handbook provided by the local TEIS office.

Consultation to assist you in your duties is available from our TEIS office by contacting:

Name of Service Coordinator

Telephone Number

Address

Signature of Surrogate Parent _____

Date _____

cc: TEIS Office



Surrogate Parent Application and Identification of Training Needs

Tennessee's Early Intervention System

Name: _____

Home Phone: _____ Work Phone: _____

Home Address: _____ Employer: _____

City, State, Zip: _____ Employer Address: _____

Current Occupation: _____

Are you above the age of 21? ☐ Yes ☐ No

Knowledge of the early intervention system: _____

Work or experience related to early intervention services: _____

Do you have knowledge and skills in the following areas:

Federal and State regulations governing the early intervention for infants and toddlers and their families? ☐ Yes ☐ No

Multidisciplinary team process? ☐ Yes ☐ No

Early intervention service options? ☐ Yes ☐ No

The Individualized Family Service Plan (IFSP) Process? ☐ Yes ☐ No

Parental rights and responsibilities? ☐ Yes ☐ No

Procedural safeguards, including mediation and due process? ☐ Yes ☐ No

The structure and procedures of the agencies providing services to the child? ☐ Yes ☐ No

Legal/advocacy resources available to parents? ☐ Yes ☐ No

Knowledge of the child you will represent? ☐ Yes ☐ No

List any specific disabilities (or developmental delays) with which you are familiar _____

List any early intervention services with which you are familiar _____

Have you ever represented a child in the identification, evaluation/assessment; and/or early intervention process?

____ Yes ____ No Please explain: _____

Are you an employee of the state or local agency involved in the provision of services to children?

____ Yes ____ No If yes, list: _____

In matching a child with an appropriate surrogate parent, efforts are made to take into account the language and native ethnicity or cultural identity of the child and the prospective surrogate parent. Please indicate any relevant information about yourself to assist in this process. _____

Please provide the names of individuals whom you have known for at least three years who could provide a reference for you related to this application.

(1) Name: _____ Phone Number _____

Address: _____

Occupation: _____

(2) Name: _____ Phone Number _____

Address: _____

Occupation: _____

Signature: _____ Date of application: _____

Print full name: _____

TEIS USE ONLY

Date application received: _____

Reviewed by: _____

Training provided in the following areas: _____

Training conducted by: _____ Date of training _____

Name of child: _____

Date of child's birth _____

Request for Surrogate Parent



Tennessee's Early Intervention System

This form is to be used by any program providing early intervention services to Part C eligible children when determining the need for a surrogate parent for a child who is now receiving early intervention services or is suspected of needing early intervention services.

Requestor Information:

Name: _____

Position/Title: _____

Agency/Program: _____

Mailing Address: _____

Telephone Number: _____ Date of Request: _____

TEIS District: _____

Child Information:

Full Name: _____

Date of Birth: _____ Home Telephone Number: _____

Home Address: _____

Ethnicity: _____ Native Language: _____ Sex: _____

Program Child Attends: _____

Description of Developmental Delay or Suspected Delay: _____

Provided by: _____

Social Worker: (if applicable)

Name: _____ Agency: _____

Address: _____ Telephone: _____

Department of Children's Services (DCS) Case Manager:

Name: _____ Telephone: _____

Designated Service Coordinator:

Name: _____ Agency: _____

Address: _____ Telephone: _____

Parent Information:

Parent(s) Name: _____

Home Address: _____

Home Phone: _____ Work Phone: _____

Name of Caretaker of Child (if not parent): _____

Address of Caretaker: _____

Home Phone: _____ Work Phone: _____

Relationship to Child: _____

Reason for Request:

- ☐ Parent Unknown
- ☐ Parent Deceased
- ☐ Parent Unavailable (Geographic Whereabouts Unknown)
- ☐ Guardianship with State Agency or Official
- ☐ Child is Ward of the State



Written Notice of Surrogate Parent Appointment

TO: Office of Early Childhood Programs
5th Floor, Andrew Johnson Tower
710 James Robertson Parkway
Nashville, TN 37243-0375
(615) 741-2851 – telephone
(615) 532-9412 - fax

FROM: _____
_____ TEIS District Office

DATE: _____

_____ has been appointed for _____
surrogate parent child's name birthdate

Support for this appointment is confirmed with documentation maintained in our office of the following:

- Letter from DHS attempts _____
- Telephone calls made attempts _____
- Correspondence sent to the parent's place of employment attempts _____
- Contact with agency responsible for care of the child attempts _____
- Contact with known relatives/other interested persons attempts _____
- Other explain _____

Training was provided by _____ on _____
trainer date

The surrogate parent has no interest that conflicts with the interest of this child and meets all other surrogate parent qualifications.

Surrogate Parent Signature _____ Date: _____

TEIS Administrator Signature _____ Date: _____

OEC Administrator Signature _____ Date: _____



Surrogate Parent Handbook



***For Surrogate Parents
Within Tennessee's Early Intervention System
(TEIS)
"Tomorrow's Success Begins Today"***



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